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Attorneys for Defendant  
THOMSON INTERNATIONAL, INC.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

MATTHEW PETERSON, et al.

Plaintiff(s),

v.

THOMSON INTERNATIONAL,  
INCORPORATED, a California corporation;  
DOES 1-10, INCLUSIVE; and ROE  
ENTITIES 1-10, INCLUSIVE,

Defendant(s).

Case No.: 1:22-CV-00701 JLT CDB

**DECLARATION OF ROBERT L.  
SALLANDER SUPPORTING MOTION OF  
DEFENDANT THOMSON  
INTERNATIONAL, INC. TO DISMISS  
PLAINTIFF CARSON BRENDA**

Date: August 6, 2024

Time: 8:30 a.m.

Dept.: Courtroom 4, 7<sup>th</sup> Floor  
2500 Tulare Street, Fresno, CA 93721

Judge: Hon. Jennifer L. Thurston

Date Action Filed: June 10, 2022

Trial Date: January 22, 2025

I, Robert L. Sallander, declare as follows:

1. I am an attorney duly licensed to practice law in all the courts of California and the Eastern District of California. I am the Managing Partner at Greenan, Pepper, Sallander & Lally LLP, attorneys for defendant Thomson International, Inc. ("Thomson") in the above-captioned case.

2. This declaration is submitted in support of Thomson's Motion to Dismiss Plaintiff Carson Brenda.

1           3.       I have personal knowledge of the matters set forth herein, and if called as a  
2 witness, I could testify as to each of the matters herein.

3           4.       Plaintiff Carson Brenda failed to produce a copy of his driver's license or a  
4 notarized version of his signed and executed CDC authorization form by February 19, 2024, and  
5 failed to appear for and complete his deposition by February 19, 2024.

6           5.       **Exhibit A** is a true and correct copy of meet & confer letter I sent to plaintiff  
7 Carson Brenda on May 23, 2024.

8           6.       Plaintiff Carson Brenda never responded to the meet & confer letter.

9           I declare under penalty of perjury under the laws of the United States that the foregoing is  
10 true and correct.

11           Executed on this 24th day of June, 2024 in San Ramon, California.

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Robert L. Sallander  
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# **EXHIBIT A**

LAW OFFICES OF  
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SALLANDER & LALLY LLP**  
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May 23, 2024

**Via First Class Mail**

Carson W. Brenda  
19448 Brookside Way  
Bend, OR 97702

**Re:** Matthew Peterson, et al. v. Thomson International, Inc.  
USDC Eastern District of California, Case No.: 1:22-cv-00701-JLT-CDB

Dear Mr. Brenda:

This letter serves as defendant Thomson International, Inc.'s ("Thomson") meet & confer with you.

As you know, on February 2, 2024, the court granted defendant's motion to compel. The court ordered that you produce a copy of your driver's license and a notarized version of your signed and executed CDC authorization no later than February 19, 2024. The court further ordered that you appear and complete your deposition no later than February 19, 2024. However, you did not produce the documents or appear for your deposition before the deadline.

If you do not respond to the court order by May 30, 2024, Thomson will have to move to dismiss your claims. I'd appreciate the opportunity to discuss with you as to how you wish to proceed.

Very truly yours,

**GREENAN, PEFFER, SALLANDER &  
LALLY LLP**



Robert L. Sallander

RLS:pc